

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

UNITED STATES OF AMERICA,
Plaintiff,

v.

BENJAMIN BOGARD,
Defendant.

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CRIMINAL No. SA-19-CR-106-DAE

DEFENDANT'S UNOPPOSED MOTION TO EXPEDITE SENTENCING

TO HONORABLE UNITED STATES DISTRICT COURT JUDGE DAVID A. EZRA:

COMES NOW, Defendant Benjamin Bogard, by and through his attorney of record, Michael Morris, and files this Unopposed Motion to Expedite Sentencing, and would show this Court as follows:

1. The sentencing in this case is currently set for August 5, 2019.
2. Defendant is facing a statutory range of zero to twenty (0–20) years' confinement.

Because probation without confinement is a possibility, each day Defendant sits incarcerated may prove unnecessary and thus wasted should Defendant be sentenced to probation.

3. Furthermore, the Pre-sentence Interview and Pre-sentence Report in this case will be very short considering Defendant's youth (twenty years' old) and absence of criminal history.
4. Defendant respectfully requests an expedited sentencing date be set as soon as possible in the Court's discretion.
5. Defendant's counsel conferred with AUSA Tracy Thompson who agrees with the aforementioned reasons and does not oppose this Motion.

Respectfully submitted,

By: Michael Morris /s/

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CERTIFICATE OF SERVICE

I, Michael Morris, hereby certify that on May 6, 2019 a true and correct copy of this Motion to Expedite Sentencing was sent to AUSA Tracy Thompson electronically via the CM/ECF system.

AUSA Tracy Thompson
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/s/ Michael Morris
MICHAEL J. MORRIS
Attorney for Defendant